

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HENRY ESPEJO, individually and on behalf  
of all others similarly situated,

*Plaintiff,*

v.

SANTANDER CONSUMER USA, INC., an  
Illinois corporation,

*Defendant.*

---

FAYE LEVINS, individually and on behalf of  
all others similarly situated,

*Plaintiff,*

v.

SANTANDER CONSUMER USA, INC., an  
Illinois corporation,

*Defendant.*

---

Case No.: 1:11-cv-08987

Honorable Charles P. Kocoras

Magistrate Judge Sidney I. Schenkier

Case No.: 1:12-cv-09431

Honorable Charles P. Kocoras

Magistrate Judge Sidney I. Schenkier

**PARTIES' STIPULATION TO BRIEFLY EXTEND BRIEFING SCHEDULE ON  
MOTIONS FOR CLASS CERTIFICATION AND SUMMARY JUDGMENT**

Plaintiffs Henry Espejo and Faye Levins ("Plaintiffs"), and Defendant Santander Consumer USA, Inc. ("Defendant"), by and through their undersigned counsel and pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7.1, hereby stipulate and agree, subject to the Court's approval, to extend the current briefing schedule on Plaintiff Levins's pending Motion for Class Certification and Defendant's Motion for Summary Judgment (the "Motions") such that the replies in support of the motions shall be due on July 11. In support of the instant stipulation, the Parties state as follows:

WHEREAS, since filing their Motions, the Parties have worked diligently to review and analyze each other's arguments. Notwithstanding, on July 6, 2016, lead counsel for Plaintiffs underwent surgery that was not anticipated at the time the previous briefing schedule was entered. While Plaintiffs were hopeful that their ability to finalize their reply briefing by the July 8th deadline would not be affected, they now require a brief extension through the weekend in order to finalize and file their reply. Accordingly, Plaintiffs have requested a modest, additional extension of the time to file their reply, to which Defendants have agreed;

WHEREAS, specifically, the Parties have agreed, subject to the Court's approval, to continue the current briefing schedule such that the replies in support of the Motions would be filed no later July 11, 2016;

WHEREAS, the Parties do not anticipate any further changes to the briefing schedule on the Motions and the requested continuances would not affect any other dates or deadlines currently set in these matters;

WHEREAS, in light of the foregoing, the Parties believe that good cause exists to grant the relief requested herein and it is not sought for any improper purpose, such as delay; and,

WHEREAS, the Parties have previously requested two extensions of the briefing schedule for the Motions.

**NOW THEREFORE, IT IS HEREBY STIPULATED and AGREED** that:

1. The replies in support of the Motions shall be filed no later than July 11, 2016.

**IT IS SO STIPULATED.**

Respectfully submitted,

**HENRY ESPEJO** and **FAYE LEVINS**,  
individually and on behalf of all others similarly  
situated,

Dated: July 8, 2016

By: s/ J. Dominick Larry  
One of Plaintiffs' Attorneys

Jay Edelson  
jedelson@edelson.com  
Benjamin H. Richman  
brichman@edelson.com  
J. Dominick Larry  
nlarry@edelson.com  
EDELSON PC  
350 North LaSalle Street, 13th Floor  
Chicago, Illinois 60654  
Tel: 312.589.6370  
Fax: 312.589.6378

Rafey S. Balabanian  
rbalabanian@edelson.com  
EDELSON PC  
329 Bryant Street, Suite 2C  
San Francisco, California 94107  
Tel: 415.234.5342  
Fax: 415.373.9435

**SANTANDER CONSUMER USA, INC.,**

Dated: July 8, 2016

By: s/ Henry Pietrkowski  
One of Defendant's Attorneys

Henry Pietrkowski (Bar No. 6230048)  
hpietrkowski@reedsmith.com  
James A. Rolfes  
jrolfes@reedsmith.com  
REED SMITH LLP  
10 South Wacker Drive  
Chicago, Illinois 60606  
Tel: (312) 207-1000

Marc A. Lackner (*pro hac vice*)  
mlackner@mcguirewoods.com  
David S. Reidy (*pro hac vice*)  
dreidy@mcguirewoods.com  
MCGUIRE WOODS LLP  
505 Sansome Street, Suite 700  
San Francisco, California 94111  
Tel: (415) 844-1974

**SIGNATURE ATTESTATION**

Pursuant to Section IX(C)(2) of the General Order on Electronic Case Filing, I hereby attest that the content of this document is acceptable to all persons whose signatures are indicated by a conformed signature (s/) within this e-filed document.

s/ J. Dominick Larry

**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2016, I served the above and foregoing by causing a true and accurate copy of such paper to be filed and served on all counsel of record via the Court's CM/ECF electronic filing system.

s/ J. Dominick Larry